



RADIOCOMMUNICATIONS APPROVALS

ACA Compliance & Labelling Requirements



**Prepared by Andrew Cutler
General Manager
EMC Technologies Pty Ltd
Auckland, New Zealand**



INTRODUCTION

- ACA
- Regulatory Framework
- Labelling Requirements for C-Tick
- Compliance Folder



Australian Communications Authority (ACA)

- Federal Government Agency has statutory responsibility under the **Radiocommunications Act 1992** to manage the spectrum
- Controls use and performance of devices that use the spectrum including unintentional emitters
- Also controls use and performance of telecommunications devices



Compliance Framework

- Manufactures, importers or authorised agents must comply with relevant standards prior to marketing
- Standards developed by Standards Australia
- Compliance by Self Declaration
 - Obtain proof of compliance
 - Affix compliance label
 - Maintain supporting documentation



Who Is Affected?

- Radiocommunications standards compliance labelling scheme applies to:
 - Any person, business or company that is the point of supply of Radiocommunications products to the Australian market
 - Australian based manufacturers/assemblers
 - Importers of Radiocomm for sale or use in Australia
 - Authorised agents or importers



Mandatory Standards

- Mandatory standards implemented by the ACMA
- Known as Radiocommunications Standards
- Are applied to a range of radio communication services
 - VHF & UHF Land mobile Equipment
 - VHF Maritime mobile
 - Cordless telephone
 - Short range devices
 - EPIRBS, Emergency beacons
 - 27MHz / UHF CB Radios etc
- Mandatory standards will be progressively introduced for new devices
 - VHF & UHF Digital Land mobile Equipment etc
- Radio standards developed by Standards Australia



Radio Standards

- Called up by the mandatory standards
- Developed by Standards Australia
 - AS/NZS 4295: VHF & UHF Land mobile Equipment
 - AS/NZS 4415.2: VHF Maritime mobile (Non DSC)
 - AS/NZS 4281: Cordless telephone
 - AS/NZS 4268: Short range devices
 - AS/NZS 4365: UHF CB Radios etc
- Mandatory standards can modify the Australian Standard
- Eg UHF CB mandatory standard adds an extra clause to AS/NZS 4365 relating to tone calling



Points to note

- Mandatory standards are regulatory instruments
- Compliance is to the mandatory standard and not the Australian Standard
- Some mandatory standards contain grandfather clauses when the Australian Standard is updated
- However others do not
- Standards other than the prescribed Australian standards cannot be used.
- Eg EN 300 086, EN 300 220, FCC part 90,



Standards To Prevent Interference

- All radio-communications devices can cause interference
- Performance requirements specified in the mandatory and Australian standards
- Mandatory standards define the applicable compliance level



Other Requirements

- EMC
 - Charger , Accessories, Car Kits
- Human Exposure to RF
 - EMR, SAR
 - Body Worn SAR applicable for Hands Free Kit
- Safety
 - Power adapters/Chargers, Handset



Electromagnetic Compatibility

- **AS/NZS CISPR22 (EN55022)**

Interference Characteristics of Information Technology Equipment (may apply depending on the product) 

- C-tick mark not to be used for devices covered by Telecoms Labelling Notice
- Charger and accessories may be C-ticked



Human Exposure to RF



- The Radiocommunications (Electromagnetic Radiation (EMR) -Human Exposure) Standard 2003
(EMR Standard 2003)
 - “Standard” sets limits for human exposure to EMR from specified mobile/portable Radiocommunications Transmitters
 - Created by Australian Communications Authority
 - Specifies ARPANSA (ICNIRP) Limits
 - Defines 3 SAR test methods



Human Exposure to RF



- The Radiocommunications (Compliance Labelling-Electromagnetic Radiation) Notice 2003

(EMR Labelling Notice)

- Register with ACA to use compliance mark
- record keeping, supporting documentation
- Testing and report requirements
- Laboratory accreditation
- Compliance levels
- Labeling requirements
- Declaration of Conformity (DoC)



Specific Absorption Rate (SAR) Limits

Based on ICNIRP

| | Controlled / Occupational | Uncontrolled / General Public |
|-------------------------------|------------------------------|----------------------------------|
| Whole Body Averaged SAR | 0.4 W/kg | 0.08 W/kg |
| Spatial peak -Head & Torso | 10 W/kg | 2 W/kg |
| Spatial peak -Limbs | 20 W/kg | 4 W/kg |

SAR measured in a 10 gram cube of tissue



ACA EMR Standard 2003

Assessment Methods for Devices Exceeding Power Threshold

| User Position | Applicable Frequency Range | ACA Evaluation Method |
|------------------------------|----------------------------|---|
| > 20 cm from Human Body | 300 kHz to 100 GHz | Power density or Field Strength Reference Level measurements - EMR Meter AS2772.2 |
| < 20 cm from Human Body | 150 MHz – 5800 MHz | SAR measurements Push-to-Talk / Body Worn devices – -SAR per Schedule 2 |
| Close Proximity to Human Ear | 300 MHz – 3000 MHz | SAR Measurements at the ear Mobile/Portable Phones - -SAR per Schedule 2 or EN50361 |
| < 2.5 cm from Human Body | 300 kHz-100 GHz | SAR test, or if less than 20 mW, - complies without testing |



Applicable SAR Tests

- Body worn SAR tests applicable for Hands Free Kits
- Applicable for devices not used at the ear
- Test house must be accredited to **ACA EMR Standard Schedule 2 and EN50361**

Safety Requirements

- Power Adapter and Plug Packs generally fall outside of the ACMA (federal) safety requirements.
- These devices are considered “Prescribed Items” and must obtain Electrical Authority Approval. (state government)
- AS/NZS 60950 (EN 60950)
 - Switch mode Charger
- AS/NZS 3108
 - Transformer Power Adapters



Compliance Arrangements

3 Levels of compliance requirements based on risk of interference

Level 1

- Radiocommunications device where non-compliance would have low interference impact on other RF spectrum users
 - Radio-controlled toys, garage door openers, door bells, etc.



Compliance Arrangements

Level 2

- Applies to devices whose non compliance would have a moderate risk of causing interference
- Presently only applies to spread spectrum devices



Compliance Arrangements

Level 3

- Applies to devices whose non compliance would have a high risk of causing interference
- Applies to most two way radio equipment like land mobile radios, UHF CB's, paging stations etc.
- Includes safety devices like EPIRB's



No Mandatory Standard!

- Applies to new devices where a standard has not yet been mandated or developed
- Currently applies to digital land mobile radios
- ACMA can authorize such devices.
- Process is called Spectrum Impact Assessment
- Based upon ACMA assessment of suitable test data from an accredited laboratory
- Item is approved so that it can be licenced and used.
- Assessment costs \$A 205
- Analogue report also required to be submitted



Compliance Folder Contents

- A Technical file contains specified documents to support a Declaration of Conformity (DoC)

Level 1

- Signed DoC
- Description of device



Compliance Folder Contents

Level 2

- Signed DoC
- Technical description of device
- Reasonable evidence of compliance
 - Accredited test report or
 - Non accredited test report or
 - FCC equipment grant + evidence to show that device meets Australian specific criteria



Compliance Folder Contents

Level 3

- Signed DoC
- Technical description of device
- Accredited test report showing compliance with a mandatory standard
 - NATA or IANZ accredited or
 - Accreditation body with a MRA with NATA or IANZ



Declaration Of Conformity

- Must be signed by manufacturer, importer or agent
- Responsible senior person within company
- Must have adequate evidence of compliance
- Can be used for variants
- Variants must be identified, rationale must be in compliance folder



Compliance Folder

- Can be stored overseas, but must be available for ACA audit in 10 days
- DoC must be held in Australia
- Can be stored electronically - hard copy must be produced for audit
- Must be kept for 5 years after last sale



Labelling Requirements

- C-tick Compliance label must be affixed with
 - unique supplier identification OR
 - C-tick supplier code OR
 - CAN number OR
 - Registered trademark OR
 - Name and Address



N1234

SAME AS EMC REGULATIONS



C-tick Labelling Requirements

- Obtain written authorisation prior to use of C-tick mark
- It is a protected trademark
- No fee
- Only issued to Australian based suppliers

SAME AS EMC REGULATIONS



C-tick Label

- Location
 - External surface, near ID label
 - On packaging when not possible on device
- Method
 - Must be durable, not easily removed
- Scale
 - Legible $\geq 3\text{mm}$
 - Characters $\geq 1\text{mm}$



C-tick Label

- Colour
 - Any colour, must be visible
- Application
 - Any point prior to marketing, in Australia or overseas
- Can be used on promotional material

SAME AS EMC REGULATIONS



Audit Procedures

- ACA conducts audits
 - At random
 - Written complaints
 - Interference complaints
 - Market surveillance

SAME AS EMC REGULATIONS



Offences

- Unauthorised use of C-Tick
- Selling unlabelled products
- Selling/labelling non-compliant products
- Making a false DoC
- Not keeping a compliance folder

SAME AS EMC REGULATIONS



Penalties

- Same as for C-tick

SAME AS EMC REGULATIONS



Other Information

- EMC Technologies Ltd
 - Melbourne
 - Sydney
 - Brisbane
 - Auckland, NZ Andrew Cutler, Manager
- Accredited Radio Testing Laboratory
- www.emctech.com.au
- AMCA Area Office
 - www.acma.gov.au

